

**OHIO EPA
TIME-CRITICAL REMOVAL ACTION
REFERRAL PACKAGE**

1. Site Location and Responsible Party Information

A. Site Name: Former Plastech Engineered Products, Inc. – Andover Facility

B. Location:
205 Maple Street Extension
Andover, OH 44003
Ashtabula County
Latitude/Longitude: N 41.612554° / W 80.568407°
Parcel ID numbers: 020132000300, 020132000700 and 020132000701
EPA ID number: OHD068896778

C. Site Contacts:

Plastech Engineered Products, Inc. Bankruptcy Liquidating Trustee:
James Carroll
Chief Liquidating Officer
Carroll Services, LLC
4 Mount Royal Ave., Suite 420
Marlboro, MA 01752
(508) 229-3366

Carroll Services, LLC represented by:
Daniel Katlein
2600 Buhl Building
535 Griswold
Detroit, MI 48226-3687
(313) 961-6141

Plastech Engineered Products, Inc. Debtor Representative:
Deborah Fish
2600 Buhl Building
535 Griswold
Detroit, MI 48226-3687
(313) 961-6141

Assets of Plastech-Andover facility, not property, purchased by:
Duane Smith
Trusted Partner, LLC
21845 Kyla Drive
Saegertown, PA 16433
(814) 547-3627

- D. Brief description of steps taken to compel responsible parties to conduct site remediation:

On February 1, 2008, Plastech Engineered Products, Inc. (Plastech) filed for Chapter 11 bankruptcy in the U.S. Bankruptcy Court, Eastern Division of Michigan, petition number 08-42417-pjs. Subsequently, on December 31, 2008, the Bankruptcy Court authorized an order for dissolution of Plastech and its subsidiaries.

In February 2009, Ohio EPA, Division of Materials and Waste Management (DMWM), attempted to work with Trusted Partner LLC, to remove regulated substances. In February 2010, Trusted Partners removed a limited amount of regulated substances. Additionally, on June 15, 2009, Ohio EPA issued a Notice of Violation (NOV) letter to Plastech and James Carroll of Carroll Services LLC, for violations of Ohio's Cessation of Regulated Operations (CRO). No response was received concerning this NOV letter.

Ohio EPA continued to monitor this facility with the intention of working with any prospective buyer of the property to address the outstanding CRO issues.

On June 13, 2012, Ohio EPA conducted an inspection of the facility which revealed regulated substances as paint/solvent, containers labeled as Corrosive and Oxidizer and leaking oil-filled electrical transformers. In addition, the site is unsecured and accessible to the public.

2. Site Description and Background Information

- A. Description of past or present operations and how wastes were generated:

Operations at the Plastech Andover facility included plastic injection molding and painting activities. Hazardous waste generated from painting activities included spent solvent and waste paint characterized as D001/D035/F003/F005. In addition, other wastes included spent spray booth filters, spray booth coating waste and used oil.

Prior to filing for bankruptcy, Plastech removed a majority of the hazardous waste from the facility. However, miscellaneous containers, other regulated substances and oil-filled electrical transformers remained at the facility.

B. Site Characteristics:

The Plastech Andover facility is an abandoned manufacturing complex. The facility consists of approximately 274,000 square feet of buildings located on approximately 20 acres of property.

The site is bounded by residential properties to the south, light industry and residential properties to the west and a wooded area to the north and east.

C. Quantity and type of wastes and/or hazardous substances:

On June 13, 2012, Ohio EPA conducted an inspection of the facility which revealed the following regulated substances:

- Two sumps in a former paint kitchen area that contained paint/solvent.
- 20, 5-gallon containers. One, 5-gallon container was labeled as an Oxidizer.
- 8, 55-gallon drums. One, 55-gallon drum was labeled as Corrosive.
- Three electrical transformers labeled as containing less than 50 PPM PCBs. Two of the three transformers were found to be leaking. Estimated volume of each transformer is 100-gallons.
- One electrical transformer labeled as non-PCB dielectric fluid with a volume of 900-gallons.

D. Analytical data or other documentation on chemical characterization of wastes present:

No assessment activities have been completed on the regulated substances identified during the June 13, 2012 inspection due to property access related issues. However, it is strongly suspected that the paint and solvent found in the sumps of the paint kitchen is a hazardous waste (i.e., D001/D035). In addition, labeling on the 5-gallon and 55-gallon containers indicated Corrosive and Oxidizer.

E. Storage / condition of containers and wastes:

The 5-gallon and 55-gallon containers are located inside buildings at the site. However, the buildings are open and unsecure.

The electrical transformers are located outdoors and exposed to weather conditions. In addition, two transformers are actively leaking.

D. Proximity of population and population density:

The site is bounded by residential properties to the south, light industry and residential properties to the west and a wooded area to the north and east. Approximately 51 people reside within a half-mile and 228 people reside within one mile of the site.

3. Threats to Public Health and the Environment

A. Description of potential exposure to humans, animals or the food chain from hazardous substances or contaminants:

The site has unrestricted access. In addition, buildings are open and unsecure. During the June 13, 2012 inspection, Ohio EPA documented trespassing as evidenced through acts of vandalism at the facility.

B. Actual or potential for releases:

During the June 13, 2012 inspection, Ohio EPA documented that the electrical transformers were leaking as evidenced by oil staining on the concrete pad and soil.

The potential exists for additional releases from containers and other regulated substances through trespassing and acts of vandalism.

C. Threat of fire or explosion:

A threat of fire or explosion is believed to exist from on-site sources. Specifically, ignitable hazardous waste is suspected in the sumps of the paint kitchen.

4. Assessment of Environmental Hazards and Proposed Response Actions

Description of hazards (real or potential) posed by site and what actions should be undertaken to reduce or eliminate hazard:

A. Uncontrolled releases of regulated substances at the site may pose a threat to human health and the environment. A threat of fire or explosion from on-site sources is believed to exist due to the presence of suspected ignitable hazardous waste.

To prevent further release or exposure to regulated substances and to eliminate the fire/explosion hazard, all regulated and hazardous substances should be adequately characterized, removed and disposed.

B. To prevent further release or exposure to regulated and hazardous substances, the following items should be evaluated and mitigated:

- All containers,
- Sumps and trench drains, and
- Electrical transformers.

5. Chronology of Events

2/11/09: Ohio EPA inspection of facility.

6/15/09: Ohio EPA NOV letter.

4/26/10: Ohio EPA inspection of facility.

6/13/12: Ohio EPA inspection of facility.

6. Index of Documents

Attachment 1: Figures depicting site location, site features and parcel information.

Attachment 2: Ohio EPA June 15, 2009 NOV letter.

Attachment 3: Ohio EPA February 11, 2009; April 26, 2010 and June 13, 2012 field notes.

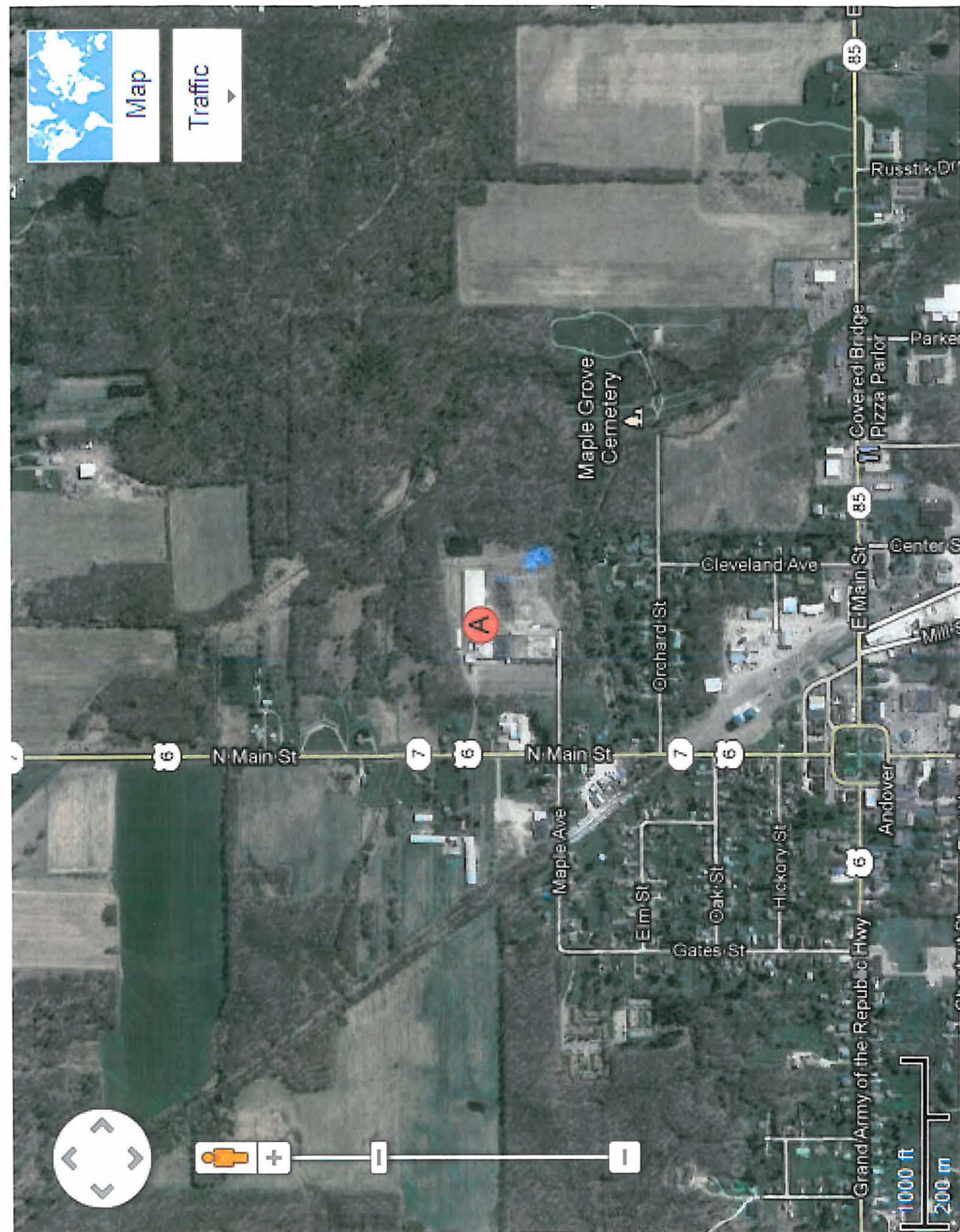
7. Contact

Frank Zingales, Ohio EPA, DMWM: (330) 963-1108 or
frank.zingales@epa.state.oh.us



Map

Traffic





Map

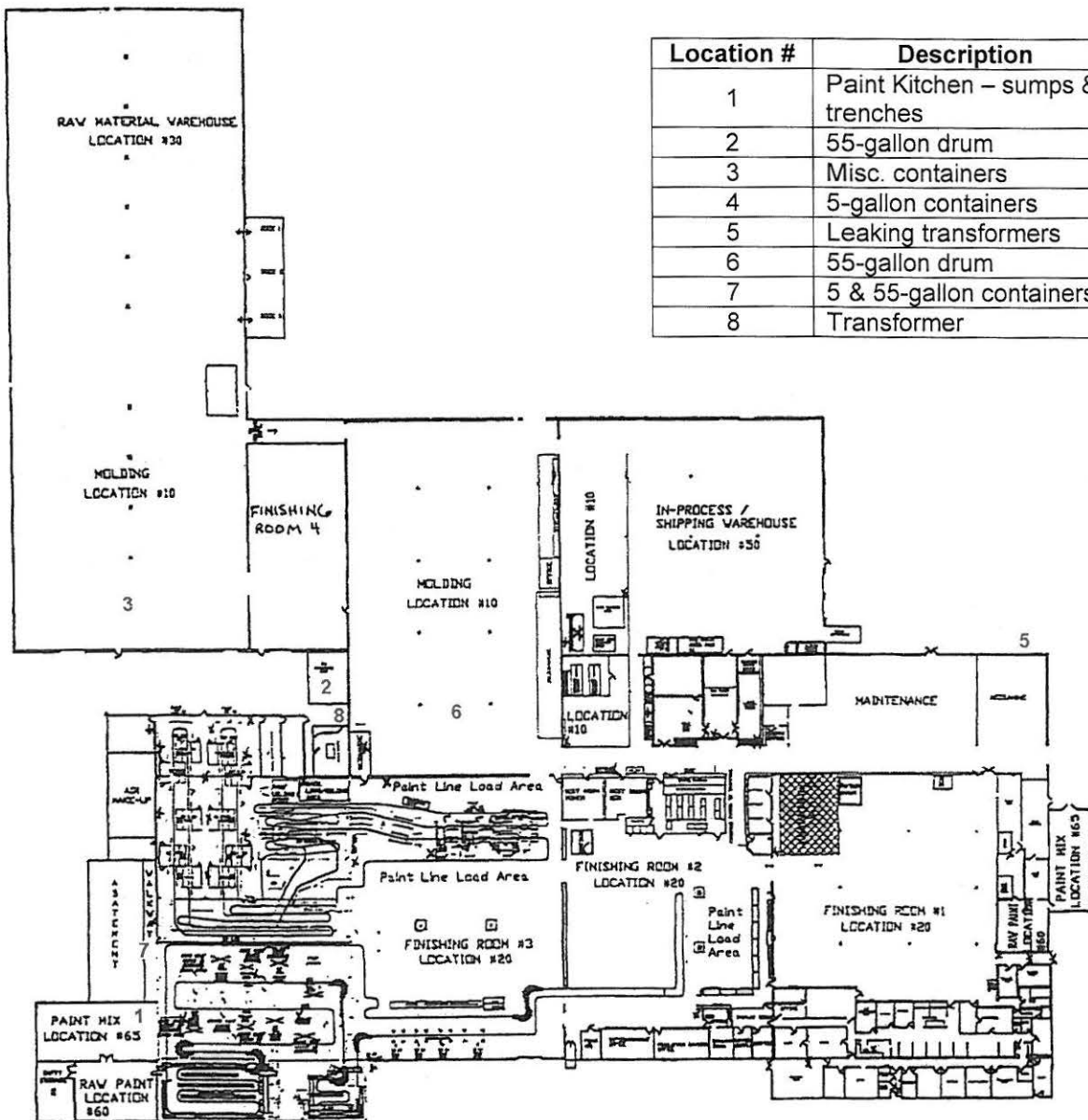
Traffic



Maple Ave

100 ft

50 m



Location #	Description
1	Paint Kitchen – sumps & trenches
2	55-gallon drum
3	Misc. containers
4	5-gallon containers
5	Leaking transformers
6	55-gallon drum
7	5 & 55-gallon containers
8	Transformer

Data For Parcel 020132000300

Base Data

Parcel: 020132000300
Owner: PLASTECH ENGINEERED, PRODUCTS INC
Address: 436 MAIN (SR 7)



Mailing Address

Mailing Name: PLASTECH
ENGINEERED
PRODUCTS INC
Address: 45000 HELM ST
City State Zip: PLYMOUTH MI 48170

Geographic

City: ANDOVER VILLAGE
Township: ANDOVER TOWNSHIP
School District: PYMATUNING VALLEY
LOCAL SCHOOL
DISTRICT

Mortgage Code

Code: 13
Description: BANKRUPTCY

Legal

Neighborhood: 34000
Legal Description: 25 N M
2004 bor#71
Map Number: 013-20-003-00
Legal Acres: 0.46
Land Use: (447)
Property Class: COMMERCIAL
Range Township Section: 0-PY-0

Valuation

	Appraised	Assessed (35%)
Land Value:	\$16,600.00	\$5,810.00
Building Value:	\$34,600.00	\$12,110.00
Total Value:	\$51,200.00	\$17,920.00
CAUV Value:		\$0.00
Taxable Value:		\$17,920.00

Tax Credits

2.5% Homesite Rollback: NO
Homestead Reduction: NO

Data For Parcel 020132000700

Base Data

Parcel: 020132000700
Owner: PLASTECH ENGINEERED, PRODUCTS INC
Address: 205 MAPLE EXT



Mailing Address

Mailing Name: PLASTECH
ENGINEERED
PRODUCTS INC
Address: 45000 HELM ST
City State Zip: PLYMOUTH MI 48170

Geographic

City: ANDOVER VILLAGE
Township: ANDOVER TOWNSHIP
School District: PYMATUNING VALLEY
LOCAL SCHOOL
DISTRICT

Mortgage Code

Code: 13
Description: BANKRUPTCY

Legal

Neighborhood: 34000
Legal Description: 25 N M
2004 bor#69
Map Number: 013-20-007-00
Legal Acres: 15.98
Land Use: (340)
Property Class: INDUSTRIAL
Range Township Section: 0-PY-0

Valuation

	Appraised	Assessed (35%)
Land Value:	\$129,500.00	\$45,330.00
Building Value:	\$1,188,500.00	\$415,980.00
Total Value:	\$1,318,000.00	\$461,310.00
CAUV Value:		\$0.00
Taxable Value:		\$461,310.00

Tax Credits

2.5% Homesite Rollback: NO
Homestead Reduction: NO

Data For Parcel 020132000701

Base Data

Parcel: 020132000701
Owner: PLASTECH ENGINEERED, PRODUCTS INC
Address: 0 MAPLE EXT



Mailing Address

Mailing Name: PLASTECH
ENGINEERED
PRODUCTS INC
Address: 45000 HELM ST
City State Zip: PLYMOUTH MI 48170

Geographic

City: ANDOVER VILLAGE
Township: ANDOVER TOWNSHIP
School District: PYMATUNING VALLEY
LOCAL SCHOOL
DISTRICT

Mortgage Code

Code: 13
Description: BANKRUPTCY

Legal

Neighborhood: 34000	Legal Acres: 3.71
Legal Description: 25	Land Use: (340)
2004 bor#70	Property Class: INDUSTRIAL
Map Number: 013-20-007-01	Range Township Section: 0-PY-0

Valuation

	Appraised	Assessed (35%)
Land Value:	\$30,800.00	\$10,780.00
Building Value:	\$359,800.00	\$125,930.00
Total Value:	\$390,600.00	\$136,710.00
CAUV Value:	\$0.00	
Taxable Value:	\$136,710.00	

Tax Credits

2.5% Homesite Rollback: NO
Homestead Reduction: NO

Dawn M. Cragon, Ashtabula County Treasurer

25 WEST JEFFERSON STREET
JEFFERSON, OH 44047
PHONE (440) 576-3727 FAX (440) 576-3221



REAL PROPERTY
2ND HALF 2011
Due 06/20/2012

PARCEL LOCATION: 436 MAIN (SR 7) ST N		PARCEL ID: 020132000300	
PLASTECH ENGINEERED 45000 HELM ST PLYMOUTH MI 48170		TAX DISTRICT: 02 - ANDOVER TWP-A VIL-PYMATU V LSD OWNER NAME: PLASTECH ENGINEERED PRODUCTS INC STUB: 120552 LEGAL: 25 N M / 2004 bor#71	
Acreage 0.4600 Class C Land Use Code 447	APPRAISED VALUE Land Building Total \$16,600.00 \$34,600.00 \$51,200.00		Gross Tax Rate 63.260000 Reduction Factor 0.165477 Effective Tax Rate 52.791944
CURRENT TAX DISTRIBUTION		TAX VALUES	
Ashtabula County \$177.81 Pymatuning Valley Lsd \$561.28 A-Tech \$44.93 Andover Twp \$15.23 Andover Corp \$146.79		Gross Taxes \$1,133.62 Reduction Factor (\$187.58) Subtotal \$946.04 10% Rollback \$0.00 2.5% Homestead Rollback \$0.00 Homestead Reduction \$0.00 CAUV Recoupment \$0.00 Farm Rollback \$0.00 Current Net Taxes \$946.04 Current Assessments \$4.50 Full Year Taxes + Asmts \$950.54 Half Year Taxes + Asmts \$475.27 Penalties \$348.98 Interest \$377.93 Adjustments \$0.00 Delinquent General Taxes \$4,057.09 Delinquent Assessments \$674.04	
Special Assessment \$4.50		TOTAL TAXES \$6,408.58	
Total \$950.54		PAYMENTS \$0.00 OTHER CREDITS \$0.00	
		HALF YEAR DUE \$0.00 FULL YEAR DUE \$6,408.58 TaxBill prepared on: 6/25/2012	
Certified Year: 2008 Mortgage Code: 13 - BANKRUPTCY Return bottom portion with payment.		06/20/2012 If you need a stamped receipt, return entire bill with a self-addressed stamped envelope; otherwise no receipt will be returned. YOUR CANCELED CHECK IS A VALID RECEIPT	

DAWN M. CRAGON, Ashtabula County Treasurer

25 WEST JEFFERSON STREET
JEFFERSON, OH 44047
PHONE (440) 576-3727 FAX (440) 576-3221

REAL PROPERTY
2ND HALF 2011
DUE 06/20/2012

OWNER: PLASTECH ENGINEERED PRODUCTS INC		MAKE CHECK PAYABLE TO DAWN M. CRAGON, ASHTABULA CO. TREASURER	
PARCEL LOC: 436 MAIN (SR 7) ST N		PARCEL ID: 020132000300 Stub # 120552 	
TAXBILL PRINTED ON: 6/25/2012		PAY THIS AMOUNT	
CERTIFIED YEAR: 2008			
MORTGAGE CODE: 13 - BANKRUPTCY		AMOUNT DUE: \$6,408.58 	

Dawn M. Cragon, Ashtabula County Treasurer

25 WEST JEFFERSON STREET
JEFFERSON, OH 44047
PHONE (440) 576-3727 FAX (440) 576-3221

REAL PROPERTY
2ND HALF 2011
Due 06/20/2012

PARCEL LOCATION: 205 MAPLE EXT ST		PARCEL ID: 020132000700			
PLASTECH ENGINEERED 45000 HELM ST PLYMOUTH MI 48170		TAX DISTRICT: 02 - ANDOVER TWP-A VIL-PYMATU V LSD OWNER NAME: PLASTECH ENGINEERED PRODUCTS INC STUB: 120593 LEGAL: 25 N M / 2004 bor#69			
Acreage	15.9800	APPRAISED VALUE		Gross Tax Rate	63.260000
Class	I	Land	Building	Total	Reduction Factor
Land Use Code	340	\$129,500.00	\$1,188,500.00	\$1,318,000.00	Effective Tax Rate
CURRENT TAX DISTRIBUTION		TAXABLE VALUE		TAX VALUES	
Ashtabula County	\$4,577.29	Land	Building	Total	Gross Taxes
Pymatuning Valley Lsd	\$14,448.72	\$45,330.00	\$415,980.00	\$461,310.00	Reduction Factor
A-Tech	\$1,156.65	HOMESTEAD		CAUV VALUE	Subtotal
Andover Twp	\$392.11	\$0.00	\$0.00		10% Rollback
Andover Corp	\$3,778.69	SPECIAL ASSESSMENT			2.5% Homestead Rollback
Special Assessment	\$4.50	Project:	Delq	Curr	Homestead Reduction
Total	\$24,357.96	19005	19.73	4.50	CAUV Recoupment
		35053	0.00	0.00	Farm Rollback
		Total	\$19.73	\$4.50	Current Net Taxes
		AVOID A 10% PENALTY			Current Assessments
Certified Year: 2008		06/20/2012			Full Year Taxes + Asmts
Mortgage Code: 13 - BANKRUPTCY		If you need a stamped receipt, return entire bill with a self-addressed stamped envelope; otherwise no receipt will be returned.			Half Year Taxes + Asmts
Return bottom portion with payment.		YOUR CANCELED CHECK IS A VALID RECEIPT			Penalties
					Interest
					Adjustments
					Delinquent General Taxes
					Delinquent Assessments
					TOTAL TAXES
					PAYMENTS
					OTHER CREDITS
					HALF YEAR DUE
					FULL YEAR DUE
					TaxBill prepared on:

DAWN M. CRAGON, Ashtabula County Treasurer

25 WEST JEFFERSON STREET
JEFFERSON, OH 44047
PHONE (440) 576-3727 FAX (440) 576-3221

REAL PROPERTY
2ND HALF 2011
DUE 06/20/2012

OWNER: PLASTECH ENGINEERED PRODUCTS INC	MAKE CHECK PAYABLE TO DAWN M. CRAGON, ASHTABULA CO. TREASURER		
PARCEL LOC: 205 MAPLE EXT ST	PARCEL ID: 020132000700	Stub # 120593	
TAXBILL PRINTED ON: 6/25/2012	PAY THIS AMOUNT		
CERTIFIED YEAR: 2008			
MORTGAGE CODE: 13 - BANKRUPTCY	AMOUNT DUE: \$159,704.65		

Dawn M. Cragon, Ashtabula County Treasurer

25 WEST JEFFERSON STREET
JEFFERSON, OH 44047
PHONE (440) 576-3727 FAX (440) 576-3221

REAL PROPERTY
2ND HALF 2011
Due 06/20/2012

PARCEL LOCATION: MAPLE EXT ST		PARCEL ID: 020132000701	
PLASTECH ENGINEERED 45000 HELM ST PLYMOUTH MI 48170		TAX DISTRICT: 02 - ANDOVER TWP-A VIL-PYMATU V LSD OWNER NAME: PLASTECH ENGINEERED PRODUCTS INC STUB: 120607 LEGAL: 25 / 2004 bor#70	
Acres 3.7100 Class I Land Use Code 340	APPRAISED VALUE Land Building Total \$30,800.00 \$359,800.00 \$390,600.00		Gross Tax Rate 63.260000 Reduction Factor 0.165477 Effective Tax Rate 52.791944
CURRENT TAX DISTRIBUTION		TAX VALUES	
Ashtabula County \$1,356.49 Pymatuning Valley Lsd \$4,281.90 A-Tech \$342.77 Andover Twp \$116.20 Andover Corp \$1,119.82		Gross Taxes \$8,648.30 Reduction Factor (\$1,431.12) Subtotal \$7,217.18 10% Rollback \$0.00 2.5% Homestead Rollback \$0.00 Homestead Reduction \$0.00 CAUV Recoupment \$0.00 Farm Rollback \$0.00 Current Net Taxes \$7,217.18 Current Assessments \$4.50 Full Year Taxes + Asmts \$7,221.68 Half Year Taxes + Asmts \$3,610.84 Penalties \$2,625.61 Interest \$2,813.85 Adjustments \$0.00 Delinquent General Taxes \$35,400.75 Delinquent Assessments \$19.73	
Special Assessment \$4.50		TOTAL TAXES \$48,081.62	
Total \$7,221.68		PAYMENTS \$0.00 OTHER CREDITS \$0.00	
		HALF YEAR DUE \$0.00 FULL YEAR DUE \$48,081.62 TaxBill prepared on: 6/25/2012	
Certified Year: 2008 Mortgage Code: 13 - BANKRUPTCY Return bottom portion with payment.		06/20/2012 If you need a stamped receipt, return entire bill with a self-addressed stamped envelope; otherwise no receipt will be returned. YOUR CANCELED CHECK IS A VALID RECEIPT	

DAWN M. CRAGON, Ashtabula County Treasurer

25 WEST JEFFERSON STREET
JEFFERSON, OH 44047
PHONE (440) 576-3727 FAX (440) 576-3221

REAL PROPERTY
2ND HALF 2011
DUE 06/20/2012

OWNER: PLASTECH ENGINEERED PRODUCTS INC PARCEL LOC: MAPLE EXT ST	MAKE CHECK PAYABLE TO DAWN M. CRAGON, ASHTABULA CO. TREASURER	
	PARCEL ID: 020132000701 Stub # 120607 	
TAXBILL PRINTED ON: 6/25/2012 CERTIFIED YEAR: 2008 MORTGAGE CODE: 13 - BANKRUPTCY	PAY THIS AMOUNT AMOUNT DUE: \$48,081.62 	



State of Ohio Environmental Protection Agency

Northeast District Office

2110 East Aurora Rd.
Twinsburg, Ohio 44087

TELE: (330) 963-1200 FAX: (330) 487-0769
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

June 15, 2009

Kelvin Scott, Resident Agent
Plastech Engineered Products, Inc.
22000 Garrison Rd.
Dearborn, MI 48124

Kelvin Scott, Resident Agent
Plastech Engineered Products, Inc.
45000 Helm St.
Plymouth, MI 48170

James Carroll
Chief Liquidating Officer
Carroll Services, LLC
4 Mount Royal Ave., Suite 420
Marlboro, MA 01752

**RE: PLASTECH ENGINEERED PRODUCTS-ANDOVER FACILITY
OHD068896778, ASHTABULA COUNTY, CRO NOV**

Gentlemen:

On February 11, 2009, Ohio EPA conducted an inspection of the former Plastech Engineered Products, Inc. - Andover Facility (Plastech) located on the Maple Street Extension in Andover, Ohio. The purpose of the inspection was to determine Plastech's compliance with Ohio's Cessation of Regulated Operations (CRO) laws as found in Chapter 3752 of the Ohio Revised Code (ORC) and Chapter 3745-352 of the Ohio Administrative Code (OAC). Ohio EPA documented the following violations of Ohio's CRO laws:

1. **ORC §3752.04 and OAC rule 3745-352-20(A)(1)(a), Notice of cessation of regulated operations.** The owner or operator, not later than thirty days after the cessation of all regulated operations at the facility, must submit to the director of Ohio EPA (director), the local emergency planning committee (LEPC) and the local fire department, a notice of the cessation of all regulated operations at the facility. The notice shall be submitted on a form prescribed by the director.

Plastech failed to notify Ohio EPA of the Andover facility's cessation of regulated operations. To abate this violation, Plastech must submit a completed CRO form 0327 to all required entities. Please refer to Appendix A in the document entitled "Cessation of Regulated Operations Manual" for a copy of this form.

2. **ORC §3752.05(A)(B) and OAC rule 3745-352-20(A)(1)(c), Designating a contact person for the facility.** Each owner or operator who is required to submit a notice of cessation of regulated operations must designate a contact person for the reporting facility. The written designation of the contact person must accompany the notice submitted under ORC §3752.04. The written designation must include the address of the principal office of the owner or operator, the business or residence address and telephone number of the contact person and must be made on the form prescribed by the director.

Plastech failed to designate a contact person for the Andover facility. To abate this violation, Plastech must submit a completed CRO form 0327 to all required entities. Please refer to Appendix A in the document entitled "Cessation of Regulated Operations Manual" for a copy of this form.

3. **ORC §3752.06(A)(1)(2) and OAC rule 3745-352-20(A)(2)(a)(b), Duties of owner or operator within ninety days of cessation of regulated operations.** The owner or operator, not later than ninety days after the cessation of all regulated operations at the facility, must do all of the following:
- Submit to the director a copy of the most recent emergency and hazardous chemical inventory form for the facility submitted to the State Emergency Response Commission (SERC) accompanied by a statement indicating whether any asbestos-containing materials are present at the facility; and
 - Submit to the director a copy of the current hazardous chemical list, or of each of the material safety data sheets (MSDS), that the owner or operator is required to have on file with the SERC.

Plastech failed to submit a copy of the most recent emergency and hazardous chemical inventory form submitted to the SERC and the most current hazardous chemical list or MSDS that Plastech is required to have on file with the SERC. To abate this violation, Plastech must submit to Ohio EPA all documentation required by ORC §3752.06 and OAC rule 3745-352-20. For additional information, please refer to the document entitled "Cessation of Regulated Operations Manual."

4. **ORC §3752.06(A)(4)(5) and OAC rule 3745-352-20(A)(2)(d), Duties of owner or operator within ninety days of cessation of regulated operations.** The owner or operator, not later than ninety days after the cessation of all regulated operations at the facility, must do all of the following:
- Drain or remove all regulated substances from each stationary vat, tank, electrical transformer, vessel and from all piping that is to remain at the facility and manage them in compliance with ORC 3752.06(A)(4)(a)(b)(c);
 - Remove from the facility all debris, non-stationary equipment and furnishings, non-stationary containers, motor vehicles and rolling stock that contain or are contaminated with a regulated substance and manage them in compliance with ORC 3752.06(A)(5)(a)(b)(c).

Plastech failed to remove all regulated substances from the facility, as well as any item that contains or is contaminated with a regulated substance. For a list of regulated substances that were not removed, please refer to Attachment A which summarizes Ohio EPA's observations made during the February 11, 2009 inspection. Additionally, Ohio EPA did not assess the facility for the presence of asbestos containing materials or Polychlorinated Biphenyls (PCBs) that may be present in electrical equipment. To abate this violation, Plastech must remove all regulated substances in compliance with ORC §3752.06(A)(4)(5) and OAC rule 3745-352-20(A)(2). Submit documentation (e.g. manifests, bills-of-ladening, receipts, etc.) that certify all regulated substances were lawfully removed from the Andover facility.

5. **ORC §3752.06(A)(6) and OAC rule 3745-352-20(A)(2)(d), Duties of owner or operator within ninety days of cessation of regulated operations.** The owner or operator, not later than ninety days after the cessation of all regulated operations at the facility, must make a written certification to the director that the actions required under ORC §3752.06(A)(4)(5) were completed in compliance with those laws and any other applicable law adopted under ORC §3752.03. The certification must be made on the form prescribed by the director and, in addition to the information required by ORC §3752.06(A), must include, the owner's or operator's name and the address of the owner's or operator's principal office.

Plastech failed to certify to Ohio EPA that all regulated substances were removed from the Andover facility. To abate this violation, Plastech must submit all documentation required by ORC §3752.06 and OAC rule 3745-352-20. Additionally, Plastech must submit a completed CRO form 0329 to all required entities. Please refer to Appendix B in the document entitled "Cessation of Regulated Operations Manual" for a copy of this form.

6. **ORC §3752.07(A) and OAC rule 3745-352-30(A)(B)(C), Securing buildings, structures or outdoor locations against unauthorized entry.** Within thirty days after the cessation of regulated operations at a facility, the owner or operator must secure against unauthorized entry into each building, structure or outdoor location at the facility where regulated operations were conducted and that contains or is contaminated with regulated substances. The owner or operator must secure each building, structure or outdoor location and any other potential means of entry. Also within the thirty-day period, the owner or operator must post on each building, structure, or outdoor location, in publicly visible locations warning signs that prohibit trespassing and state: "The building, structure, or outdoor location of operation contains or is contaminated with regulated substances that may endanger public health or safety if released into the environment." All entry barriers and warning signs must be inspected weekly as prescribed in OAC rule 3745-352-30(C). The owner or operator must continue the security measures and maintain the warning signs until the owner or operator has complied with ORC § 3752.06 and the director has verified the compliance and concurred with the owner's or operator's certification.

Plastech failed to secure the facility against unauthorized entry, post warning signs and conduct inspections. To abate this violation, Plastech must submit documentation that the facility has been secured against unauthorized entry, warning signs were posted and inspections are being conducted. All documentation submitted must demonstrate compliance with ORC §3752.07 and OAC rule 3745-352-30.

For information concerning the CRO laws, please refer to Ohio EPA's guidance document entitled "Cessation of Regulated Operations Manual," available at: http://www.epa.state.oh.us/dhwm/cro/CRO_Manual.pdf.

As required by OAC rule 3745-52-34(A)(1)(e) and in accordance with OAC rules 3745-66-11 and 3745-66-14, Plastech must conduct closure (i.e., decontamination) activities for all areas where hazardous wastes were accumulated. For additional information concerning closure activities, please refer to Section 1.10 of Ohio EPA's Closure Plan Review Guidance for RCRA Facilities, available at: <http://www.epa.state.oh.us/dhwm/cprg.html>.

Within 14 days of the date of this letter, submit a response to the undersigned addressing each violation appearing in this letter. Pertinent documentation to address each violation must accompany your response.

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve you from having to comply with all applicable regulations. Nothing in this letter shall be construed to authorize any waiver from the requirements of any applicable state or federal laws or regulations. This letter shall not be interpreted to release the owner or operator of or others from responsibility under Chapters 3704, 3714, 3734 or 6111 of the Ohio Revised Code or under the Federal Clean Water or Comprehensive Environmental Response, Compensation, and Liability Acts remedying conditions resulting from any release of contaminants to the environment.

Should you have any questions, please contact me at (330) 963-1108.

Sincerely,



Frank Zingales
Environmental Specialist
Division of Hazardous Waste Management

FZ:ddw/Enclosure

ec: Harry Sarvis, DHWM, CO
Ralph McGinnis, DHWM, CO
Nyall McKenna, DHWM, NEDO
cc: Amanda Sturm, AGO
Duane Smith, Trusted Partners LLC

Inspection Field Notes for Former Plastech-Andover Facility

Facility&Address: Former Plastech Engineered Products, Inc.-Andover
205 Maple Street Extension
P.O. Box 459
Andover, OH 44003
ID number: OHD068896778
Inspector: Frank Zingales (FZ)
Date: 2/11/09
Time: 1000-1140
Facility Rep: Laurie Frederick (LF)
Cell phone: (440) 344-0265
E-mail: bucshell@email.com
Purpose of Inspection: Compliance evaluation inspection
Sample(s) Taken: No
Photograph(s) Taken: Yes

FINDINGS:

Arrived on-site and inspected exterior areas of facility-north and west sides. North side-equipment present in Quonset Hut on; no containerized wastes observed. West side-on door leading to office area: This plant is closed. If you need assistance please call 313-468-2005.

Inspected east side of facility. Scrap metal roll-off boxes present. Vehicles in parking lot. Door on southeast side was observed open. FZ entered.

Met LF. FZ announced purpose of inspection to LF. LF indicated:

- Assets of Plastech purchased, not property.
- Selling equipment on E-bay.
- Duane Smith (814-547-3627) was one of the partners who purchased the assets.

FZ asked LF if she was aware if any hazardous materials/wastes were present. LF indicated that she was not aware of any. Oil from machines/presses drained into drums prior to being removed from site.

Toured interior of facility with LF.

Toured Paint Line. Paint line being disassembled. LF indicated that attempting to sell or may scrap line. FZ indicated that remaining filter media must be disposed of appropriately.

Finishing Room #2

- 6, 1-gallon containers of Excell Plus
- 1-gallon container of Red Spot, flammable liquid.
- 3, <QT. containers of sodium hydroxide

- 1000-gallon tank with approximately 12" of liquid in bottom. Tank number C26976, labeled as Nalco DA 6687 (contains 2-butoxyethanol).
- 1000-gallon tank with approximately 12" of liquid in bottom. Tank number C26977, labeled as Nalco DA 6687 (contains 2-butoxyethanol).
- 5-gallon container of Solventol 2409.
- 5-gallon container of Nalco NAL Prep III
- 55-gallon vacuum drum with limited amounts of used oil.

North Paint Kitchen

- 1, 5-gallon container of paint related waste.
- 6, <1-gallon containers of miscellaneous cleaners.
- No containers present in former hazardous waste accumulation area.

Maintenance

- 3, 5-gallon containers.
- 5, 1-gallon containers of solvent related materials.
- Oil Room: 5-gallon and 55-gallon containers. Requested LF to verify all were empty.

South Paint Kitchen

- No containers present in former hazardous waste accumulation area.

Molding Location #10 (EPA location A)

- 4, 55-gallon drums: used oil.
- Office area: 5-gallon pail and automotive battery.

Molding Location #10 (EPA location B)

- 2, 5-gallon containers and 1, 20-gallon container, used oil.
- 55-gallon drum, 1/2 full of clear liquid.
- 55-gallon drum, 3/4 full, used oil.
- 20-gallon container of Nalco 7365, corrosive label.
- 1-gallon container (red safety can), solvent related.
- Compressed gas cylinders.
- Used oil/absorbent on floor and in trench drains.

Loose fluorescent lamps present. LF indicated that will attempt to sell. Observed one broken lamp. FZ indicated that lamps which cannot be sold or are broken must be appropriately managed (disposed or recycled).

FZ to contact Duane Smith concerning status of facility.

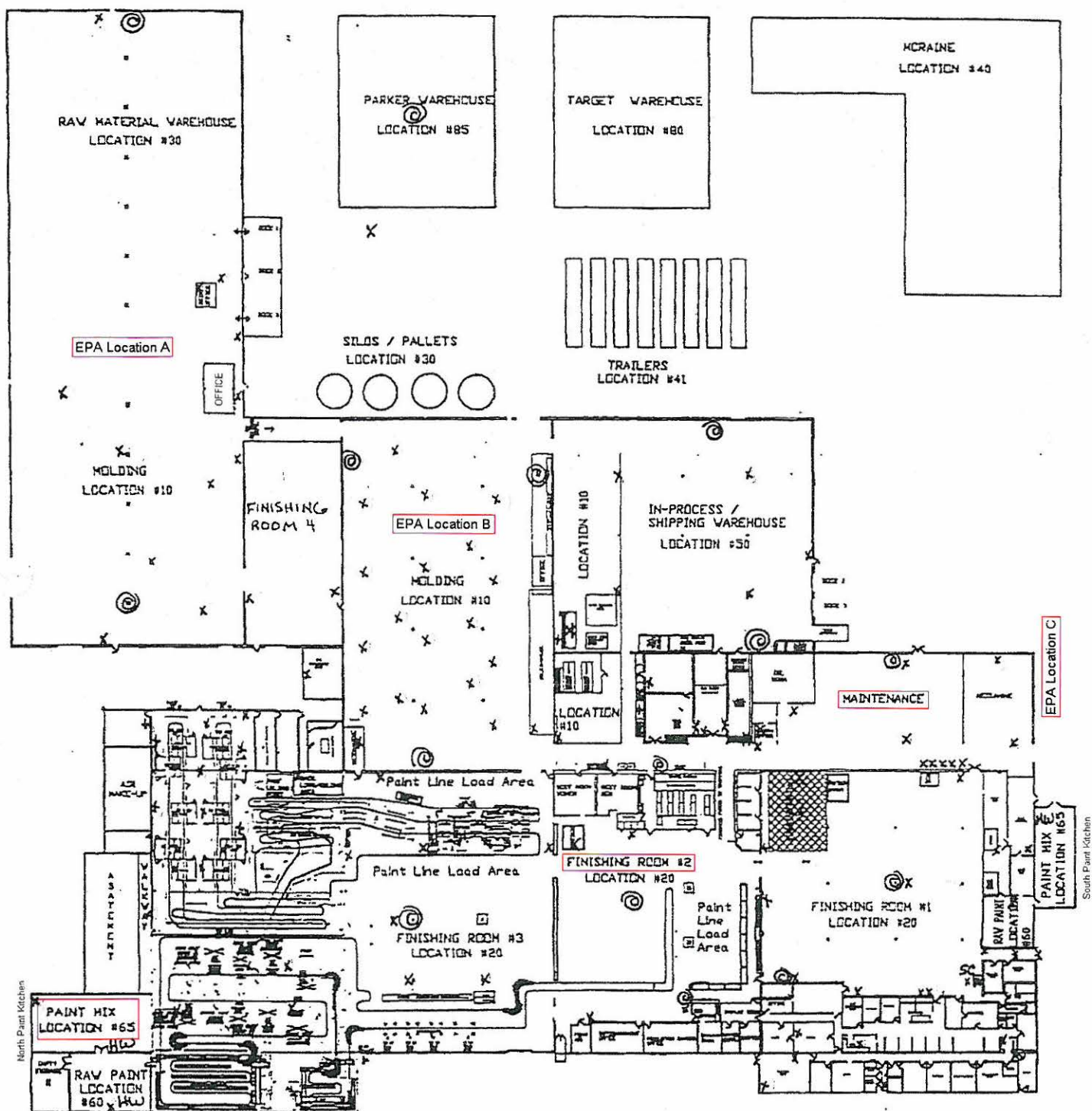
Inspected exterior of facility.

Southeast corner/South side of property-wood pallets and plastic packaging present.

Southwest side of facility (EPA location C)-observed compressed gas cylinders.

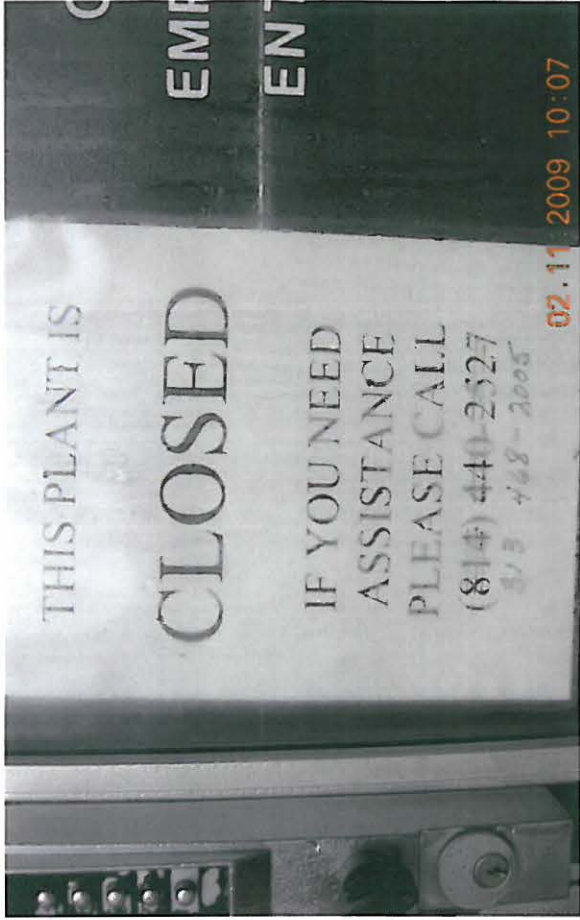
Left site.

Ohio EPA Photograph Log Former Plastech-Andover Facility February 11, 2009 All digital photographs taken and logged by Frank Zingales. DHWM Digital Camera #5 - Nikon Coolpix 5600		
Photo #	Area	Description
1&2	West Side- Office	View of sign on door to Office area of facility.
3&4	Southeast corner/South side of property	Perspective of wood pallets and plastic packaging.
5	West side	View of front of facility.





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Inspection Field Notes for Former Plastech-Andover Facility

Facility&Address: Former Plastech Engineered Products, Inc.-Andover
205 Maple Street Extension
Andover, OH 44003
ID number: OHD068896778
Inspector: Frank Zingales (FZ)
Date: 4-26-10
Time: 0955-1115
Facility Rep: Duane Smith (DS) – Trusted Partners
Purpose of Inspection: Compliance evaluation inspection
Sample(s) Taken: No
Photograph(s) Taken: Yes

FINDINGS:

Arrived on-site and met with DS. DS provided access to facility. DS indicated that he was finishing up with removing industrial equipment. DS believed that the facility will be abandoned and go to Sheriff's sale. All utilities shut-off. Toured interior of facility with DS.

Finishing Room #2

- 2, 1000-gallon tanks (numbers C26976 & 26977) had been removed. Tanks were purchased and removed by paint equipment contractor. DS did not know if the tanks were drained prior to removal.

Finishing Room #1

- Electronic equipment (computer monitors, copiers) present. DS indicated that office related equipment was moved into area and attempted to sell on E-bay.

South Paint Kitchen

- DS indicated that nothing was done to area.
- No containers present in former hazardous waste accumulation area.

DS indicated that items on list identified by FZ were collected and taken to ECS&R. DS indicated that solvents and paints were taken to ECS&R.

Oil Room

- Plastic tray containing oil.

Molding Location #10 (EPA location B):

- Compressed gas cylinder (Oxygen) to be removed by DS.
- 2, 55-gallon drums of used oil; each $\frac{3}{4}$ full.
- Used oil/absorbent in trench drains.
- Injection molding equipment removed from area.

Molding Location #10 (EPA location A):

- 1, 55-gallon drum of used oil, ¼ full.
- Flammable compressed gas cylinder (Propylene).
- Cardboard and drums of plastic pellets.
- Office area: automotive battery.

DS indicated that private guy took oil to burn in his space heater. FZ requested name of gentlemen and explained used oil rules concerning burning of used oil.

Paint Line Area

- Paint booths were purchased and removed by paint equipment contractor.
- Observed evidence of fire. DS indicated that fire occurred at facility while contractor was removing equipment. Andover Fire Department responded.

North Paint Kitchen

- Paint related waste present in trench drains and sumps. Noted two sumps, each approximately 30" X 30" with 12" and 4"-6" of paint waste, respectively, in bottom.
- No containers present in former hazardous waste accumulation area.

Fluorescent lamps (intact and broken) and various solid wastes present throughout facility.

Inspected exterior of facility.

South/Southeast side of property:

- 3 compressed gas cylinders (propane). Label info: property of AmeriGas-Ashtabula.
- Wood pallets, plastic packaging and solid waste present.
- 3 transformers (numbers 91780, 91781 and 91782). Label indicated PCB content <50 ppm.

Southwest side of facility (EPA location C)-observed compressed gas cylinder.

Air Abatement System

- Purchased and removed by paint equipment contractor.
- Waste present in exhaust vents and filter media.
- 2, 5-gallon containers of compressor fluid.

North side-equipment present in Quonset Hut; no containerized wastes observed.

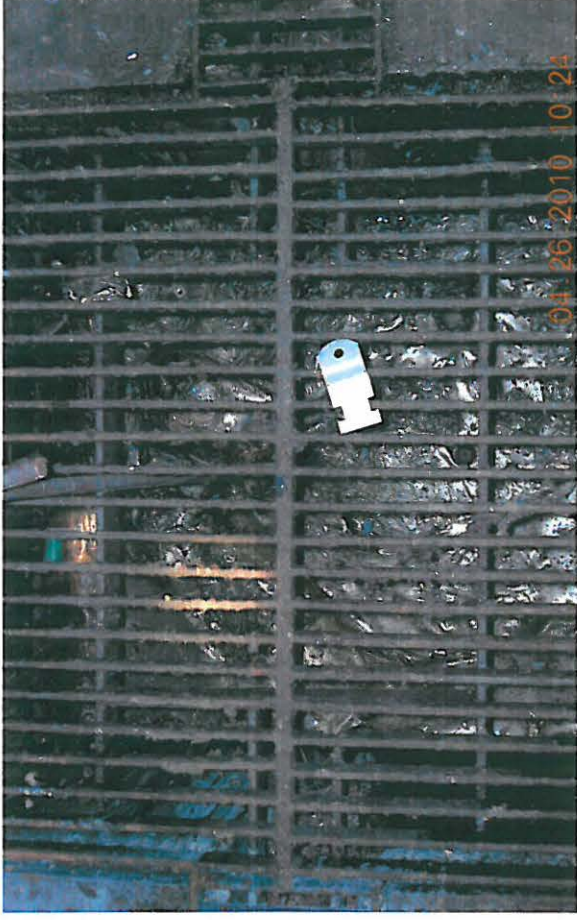
DS inquired concerning his liability at property; did removing the items on the list take care of it. FZ could not address question, informed DS to seek counsel if he chose to. FZ indicated that would acknowledge some items on list were removed by DS. FZ noted that hazardous substances remain at property and need to be addressed. FZ requested name of gentlemen who removed used oil and if DS becomes aware that facility goes for sale to notify FZ. Left site

Ohio EPA Photograph Log Former Plastech-Andover Facility April 26, 2010 All digital photographs taken and logged by Frank Zingales. DHWM Digital Camera #5 - Nikon Coolpix 5600		
Photo #	Area	Description
1&2	Interior, North Paint Kitchen	Sump with approximately 12" of paint waste in bottom.
3-5	Exterior, South/Southeast	3 compressed gas cylinders (propane).
6-8	Exterior, South/Southeast	View of wood pallets, plastic packaging and solid waste.
9-11	Exterior, Southwest side	3 transformers and label info.
12	Exterior, Southwest side	Compressed gas cylinder.
13-17	Exterior, North side	View of area where air abatement system was removed from. Waste present in vents.
18&19	Exterior, West side	View of front of facility.

Former Plastech Andover Facility
205 Maple St. Ext.
Andover, OH 44003



Photograph #1



Photograph #2



Photograph #3



Photograph #4



Photograph #5



Photograph #6



Photograph #7



Photograph #8



Photograph #9



Photograph #10



Photograph #11



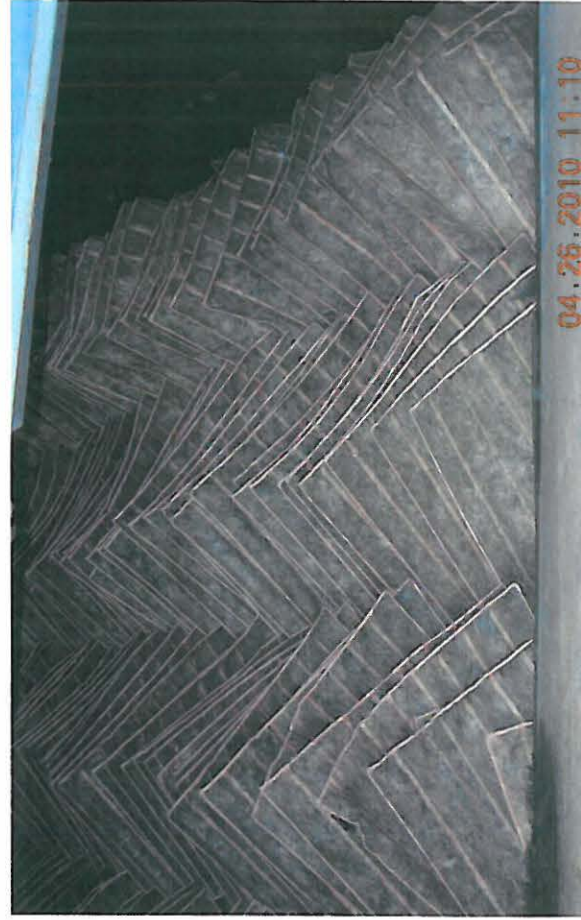
Photograph #12



Photograph #13



Photograph #14



Photograph #15



Photograph #16



Photograph #17



Photograph #18



Photograph #19

Inspection Field Notes for Former Plastech-Andover Facility

Facility&Address: Former Plastech Engineered Products, Inc.-Andover
205 Maple Street Extension
Andover, OH 44003
ID number: OHD068896778
Inspector: Frank Zingales (FZ) and Frank Popotnik (FP)
Date: 6-13-12
Time: 1130-1245
Purpose of Inspection: Identify status of facility.
Sample(s) Taken: No
Photograph(s) Taken: Yes

FINDINGS:

Arrived on-site. Observed that the facility was unsecure. Front (northwest corner) of building was open and accessible areas.

Proceeded to north side of facility.

Paint Mix Location #65, North Paint Kitchen (EPA location 1)

- Exterior door open/unsecure and window broken.
- Interior – Paint/solvent related waste present in trench drains and sumps. Waste had a paint/solvent odor. Observed two sumps, each approximately 30" X 30" with 12" and 4"-6" of paint waste, respectively, in bottom.

Room West of Finishing Room 4 (EPA location 2):

- Exterior door open/unsecure.
- One, 55-gallon drum, full, with contents.
- Outside – one, 5-gallon pail with contents.

Molding Location #10 (EPA location 3) and Raw Material Warehouse Location #30:

- Two exterior doors open/unsecure.
- Shop-vac containing used oil.
- Two carbon dioxide fire extinguishers.
- Cardboard and drums of plastic pellets.
- Evidence of vandalism – graffiti on walls.

Proceeded to south side of facility. Gate open/unsecured.

South side of property, exterior building (EPA location 4):

- Door open/unsecure.
- Approximately 12, 5-gallon pails with contents. One pail labeled as Oxidizer 5.1.

Southeast side of property, exterior:

- EPA location 5: Fence gate open/unsecure around 3 transformers (numbers 91780, 91781 and 91782). Labels indicated PCB content <50 ppm. Two transformers were leaking oil at base (91780 and 91781). Evidence of vandalism at electrical panel.
- Wood pallets, plastic packaging and solid waste present.

Molding Location #10 (EPA location 6):

- 1, 55-gallon drum of used oil; $\frac{3}{4}$ full. Oil on floor.
- Absorbent in trench drains.

Room north of former Paint Line Area (EPA location 7):

- 8, 5-gallon pails and 7, 55-gallon drums (6 steel and 1 plastic) with contents. One plastic drum labeled as Corrosive. Plastic pails labeled as Protecto.
- Evidence of fire at Paint Line Area.

Fluorescent lamps (intact and broken) present throughout facility.

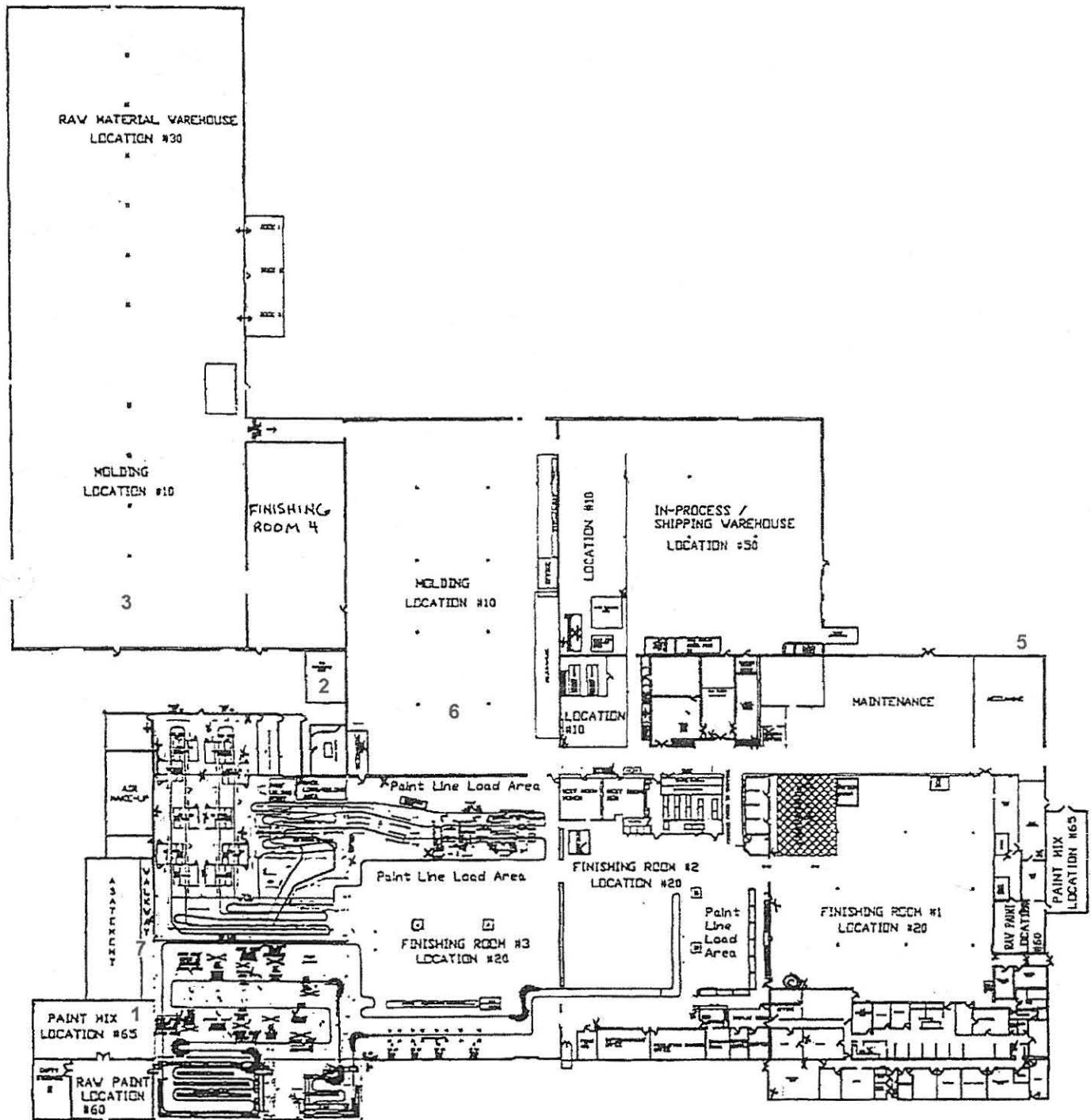
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Ohio EPA Photograph Log
Former Plastech-Andover Facility
June 13, 2012
All digital photographs taken by Frank Zingales.
Camera – Canon PowerShot SD1300 IS

Photo #	Area / EPA Location	Description
1-3	1	Paint Mix Location #65, North Paint Kitchen: Sump with approximately 12" of paint waste in bottom.
4&5	1	Paint Mix Location #65, North Paint Kitchen: Exterior door open/unsecure and window broken.
6&7	Air Abatement	Former Air Abatement System – Exterior perspective view.
8&9	2	Room West of Finishing Room: Exterior door open/unsecure. One, 55-gallon drum, full, with contents.
10-12	3	Molding Location #10 (EPA location 3) and Raw Material Warehouse Location #30: Two exterior doors open/unsecure. Shop vac with oil.
13-15	4	South side of property, exterior building: Door open/unsecure. Approximately 12, 5-gallon pails with contents. One pail labeled as Oxidizer 5.1.
16-25	5	Southeast side of property: Fence gate open/unsecure around 3 transformers (numbers 91780, 91781 and 91782). Label indicated PCB content <50 ppm. Two transformers were leaking oil at base. Evidence of vandalism at electrical panel.
26	Southwest Side	View of open/unsecured gate at southwest side of facility.
27	Southwest Side	View of front of facility (southwest side).
28-30	6	Molding Location #10: 1, 55-gallon drum of used oil; ¾ full. Oil on floor.
31-37	7	Room north of former Paint Line Area: 8, 5-gallon pails and 7, 55-gallon drums with contents. One plastic drum labeled as Corrosive. Plastic pails labeled as Protecto.
38	Paint Line Area	Evidence of fire that occurred at facility.
39-43	1	Paint Mix Location #65, North Paint Kitchen: Sump with approximately 4-6" of paint waste in bottom. View of trench drains containing paint waste.
44-47	Northwest Side	View of front of facility (northwest side). Open and accessible areas.
48		Plastech sign at entrance to Maple Street Extension.



Former Plastech Andover Facility
205 Maple St. Ext.
Andover, OH 44003





6-13-12 001



6-13-12 002



6-13-12 003



6-13-12 004



6-13-12 005



6-13-12 006



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